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Attorneys for Wells Fargo Bank, N.A.
L&A Case No. 15-48492

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH
NORTHERN DIVISION

In re:	Bankruptcy No. 12-29200 RKM
Allen Shayne Kerr and Gina Torres,	(a Chapter 13 case)
Debtors.	Filed Electronically

OBJECTION TO THE DEBTORS' MOTION FOR
APPROVAL OF SALE OF REAL PROPERTY

Wells Fargo Bank, N.A. ("Creditor") a secured creditor of the above-referenced debtors, objects to the debtors' Motion for Approval of Sale of Real Property as follows:

1. Creditor objects to a sale of the Property unless and until the Creditor is paid in full at the time of closing, or the debtor obtains written approval for a "short sale" of the Property.
2. The approximate payoff to this Creditor is \$284,665.32, whereas the debtor is only proposing payment in the amount of \$214,619.85. Because the listed payoff is approximate, the

debtors or their closing agent must contact Creditor within 24 hours prior to closing to obtain or verify a correct payoff amount.

3. Creditor further requests that the order approving the sale contain language “that the mortgage or debt to Creditor shall be paid in full at the time of closing” as opposed to specifying an amount to be paid as the amount changes daily based upon the interest due.

DATED: May 6, 2015

LUNDBERG & ASSOCIATES

By /s/Mark S. Middlemas
Mark S. Middlemas
Attorneys for Creditor

CERTIFICATE OF NOTIFICATION

I certify that on May 6, 2015 I sent a copy of the foregoing Objection, electronically or by first class mail, to each of the following:

David M. Cook
David M. Cook, P.C.
cook@utlawyer.net
ECF
Attorney for Debtors

Kevin R. Anderson
kanderson@ch13kra.com, lneebling@ch13kra.com
ECF
Chapter 13 Trustee

/s/Mark S. Middlemas
Mark S. Middlemas

CERTIFICATE OF SERVICE – MAIL, OTHER

I certify that on May 6, 2015 I caused to be served a true and correct copy of the foregoing Response to Debtor's Motion for Approval of Sale of Real Property as follows:

Mail Service – By regular first class United States mail, postage fully pre-paid addressed to:

Allen Shayne Kerr
Gina Torres
270 South 450 West
Layton, UT 84041
Debtors

/s/Mark S. Middlemas
Mark S. Middlemas